## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-VS-

CASE NO. 2:19-CR-162 JUDGE MORRISON

HUSSEIN GULED ADAM,

Defendant.

## UNOPPOSED MOTION FOR CONTINUANCE OF TRIAL AND FOR EXTENSION OF DEADLINES

Now comes Defendant, Hussein Guled Adam, by and through undersigned counsel, and respectfully moves the Court for an Order continuing the trial scheduled for September 23, 2019 and extending the schedule for motions and other pretrial filings. The reasons in support of this Motion are more fully set forth in the Memorandum below.

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stevebrownatty@gmail.com Trial Attorney for Defendant

## MEMORANDUM IN SUPPORT

Undersigned counsel is continuing to review the discovery provided to date, and he understands that there may be additional discovery forthcoming that will require review. The requested continuance would allow undersigned counsel to complete the review of discovery and intelligently discuss the specifics of the discovery with Defendant. Additional time to review the discovery is also necessary to allow undersigned counsel to adequately engage in plea negotiations

and/or prepare for trial.

Defendant submits that the ends of justice served by the continuance outweigh the best interest of the public and Defendant in a speedy trial, and a failure to grant the requested continuance will result in a miscarriage of justice. Defendant hereby waives his speedy trial rights for the period of the continuance, pursuant to 18 U.S.C. 3161. The Government does not oppose this Motion.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon Jessica Knight, Esq. via email and ECF on this 19<sup>th</sup> day of August, 2019.

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